

|                                   |     |                                    |
|-----------------------------------|-----|------------------------------------|
| STATE OF INDIANA                  | )   | IN THE LAKE SUPERIOR/CIRCUIT COURT |
|                                   | )ss |                                    |
| COUNTY OF LAKE                    | )   | SITTING IN _____, INDIANA          |
| ESMERELDA GARCIA                  | )   |                                    |
|                                   | )   |                                    |
| Plaintiff,                        | )   |                                    |
|                                   | )   |                                    |
| Vs.                               | )   | CAUSE NO:                          |
|                                   | )   |                                    |
| WEC 2000B-CSF-7 LLC, CVS          | )   |                                    |
| Pharmacy, Inc., CVS HEALTH Corp., | )   |                                    |
| CVS Indiana, LLC d/b/a CVS,       | )   |                                    |
|                                   | )   |                                    |
| Defendants.                       | )   |                                    |

**COMPLAINT**

Comes Now Plaintiff, Esmerelda Garcia, by counsel, Law Office of David Gladish, P.C. by Mark Schocke and David Gladish, and hereby asserts the following cause of action against Defendants, WEC 2000B-CSF-7 LLC, CVS Pharmacy, Inc., CVS HEALTH Corp., CVS Indiana, LLC d/b/a CVS as follows:

1. Plaintiff Esmerelda Garcia is an adult resident of the City of Hammond, Lake County, State of Indiana.
2. Defendant WEC 2000B-CSF-7 LLC is a domestic limited liability company doing business in the City of Hammond, Lake County, State of Indiana.
3. Defendant CVS Pharmacy, Inc. is a foreign corporation doing business in the City of Hammond, Lake County, State of Indiana.
4. Defendant CVS Health Corporation is a foreign corporation doing business in the City of Hammond, Lake County, State of Indiana.
5. Defendant CVS Indiana, LLC is a domestic limited liability company doing business in the City of Hammond, Lake County, State of Indiana.

5. On or about August 12, 2017, Plaintiff was an invitee of the CVS store located at 6445 Calumet Avenue, Hammond, Indiana.

6. Defendants owed Plaintiff a duty of care which included providing safe ingress and egress while Plaintiff was on the Defendants' property.

7. That Defendants proceeded to breach the duty of care it owed to the Plaintiff by allowing a dangerous condition to exist on the property.

8. That as a direct and proximate result of the Defendants' negligence as aforesaid, Plaintiff violently fell to the ground on the premises resulting in severe personal injuries requiring medical care and attention along with the incidental and consequential expenses involved therewith. That while the Plaintiff was convalescing from her injuries, she has suffered emotional distress as well as loss of enjoyment of life.

WHEREFORE, the Plaintiff Esmerelda Garcia respectfully requests judgment against Defendants WEC 2000B-CSF-7 LLC, CVS Pharmacy, Inc., CVS HEALTH Corporation and CVS Indiana, LLC in an amount of money that will adequately compensate her for the injuries and damages she has sustained, continues to sustain, for costs of this action and for all other just and proper relief in the premises.

**JURY DEMAND**

Plaintiff demands trial by jury.

/s/Mark J. Schocke

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